



United States Attorney  
Southern District of New York

MEMO

50 Main Street, Suite 1100  
White Plains, New York 10606

October 25, 2023

**BY CM/ECF**

The Honorable Kenneth M. Karas  
United States District Court  
Southern District of New York  
The Hon. Charles L. Brieant Jr.  
Federal Building and United States Courthouse  
300 Quarropas Street  
White Plains, New York 10601-4150

**Re: *United States v. Almighty Ward, et al.*, 22 Cr. 47 (KMK)**

Dear Judge Karas:

The Government respectfully writes, with the consent of the defendants, to request an adjournment of the next pretrial conference in this matter, currently scheduled for November 2, 2023.

As the Court is aware, the parties were last before the Court on June 16, 2022 for a pretrial conference. Since that appearance, the Government has produced all of the Rule 16 discovery in its possession and has discussed potential pretrial resolutions with the defendants. Additionally, on December 14, 2022, Justice Jackson, Tyrell Simon, and Markell Williams were arraigned on racketeering and other charges in a separate indictment, *United States v. Jeremy Williams, et al.*, 22 Cr. 641 (PMH). The next scheduled conference in *Williams* is on January 17, 2024. Based on the above, the parties believe that an adjournment of the next pretrial conference until after the *Williams* status conference on January 17, 2024, to be scheduled at the Court's discretion, will serve the ends of justice and conserve judicial resources as the parties continue to review discovery in the above-referenced case and in *Williams*, and discuss potential pretrial resolutions in both cases.

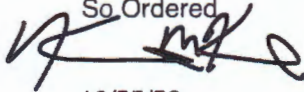
Should the Court grant the adjournment, the Government further respectfully requests, without objection from the defendants, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from November 2, 2023 through the date of the rescheduled pretrial conference. The Government respectfully submits that an exclusion of time would serve the ends of justice and outweigh the best interests of the public and the defendants in a speedy trial because it would allow (i)

defense counsel time to continue reviewing discovery; and (ii) continued discussions regarding potential pretrial resolutions.

Accordingly, the Government respectfully encloses a proposed order excluding time.

Granted. The next conference will be  
on 1/25/24, at 11:30

So Ordered



10/25/23

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

by: \_\_\_\_\_/s/\_\_\_\_\_

Jennifer N. Ong  
Ryan W. Allison  
Nicholas S. Bradley  
Assistant United States Attorneys  
(914) 993-1926  
(914) 993-1953  
(212) 637-1581

cc: Counsel of Record (by CM/ECF)